DCAS system and Web GUI (or a customized LEC interface). In general, the front-end provides the LEC end user with a consistent graphical user interface, and a number of user friendly features, such as automatic pop-up help screens, automatic field fill, automatic edit, and automatic routing of the request to multiple OSSs systems with a single command.

33. The predominant means currently available to NYNEX New York retail representatives for accessing preorder, order and related NYNEX New York OSS functions typically provides few or none of these features. The closest current "front-end" equivalent is the NYNEX New York NewView Order Entry system. The NewView front-end system is currently in use by approximately 7% of the NYNEX New York retail customer representative population. Most NYNEX New York retail representatives are provided with OSS access via a "3270 emulation", or "dumb terminal" interface - an older technology requiring a higher level of expertise and specialized training.

34. NYNEX New York believes the appropriate test of comparability of access to OSS functions is to evaluate three basic characteristics:

Availability of Access;

Functionality and

Response to OSS Transactions.

Each of these characteristics is addressed below.

35. NYNEX New York intends to provide LECs with access to NYNEX New York OSS functions during all periods that the NYNEX New York retail representative has access. In the event of a failure of any system component that would prevent access, notification will be sent to the LEC representative at the same time it is sent to the NYNEX New York retail representative. If the failed component is unique to the access path for the LEC, and the failure exceeds a predetermined period (e.g., 10 minutes), NYNEX New York will take appropriate action, such as switching all traffic over to an alternate system.

36. The OSS functionality that NYNEX New York provides to the LECs is substantially equivalent to that available to the NYNEX New York retail representatives. This includes requests processed through the NewView system. In some instances, of course, there is no NYNEX New York retail representative equivalent (for example, in the case of UNE).

37. As of this writing, NYNEX New York provides automatic flow-through on all pre-order requests except for conditioning information on ISDN loops, CFA and CLLI information and CABS-based CSRs. For those LEC pre-order functions that are supported by automatic flow-through, the LEC representative will receive comparable response times. For service orders, NYNEX New York will be providing automatic flow-through on a select set of four expected high volume service order types on or about April 1. Again, these service orders will experience response times comparable to those experienced by NYNEX New York retail.

38. It should be noted that for many order types, even NewView does not provide automatic flow-through for the NYNEX New York retail environment, and, in such cases, the order must be manually entered into SOP by the NYNEX New York retail representative. Similarly, where NYNEX New York does not yet provide automatic flow-through of a LEC order, NYNEX New York sends the order request to the NYNEX New York Resale or CATC Service Center, where a NYNEX New York service representative manually enters the order into SOP. The LEC representative is not required to enter the order into SOP.

39. Where automated flow-through or processing currently exists for NYNEX New York retail operations and not for LECs, and the differential treatment results in non-comparable access to OSS functions, NYNEX New York is committed to modifying its systems or taking other corrective measures.

40. NYNEX New York believes that comparability is ultimately determined by measuring the relative amount of work (e.g., orders) that can be completed by a LEC service representative population, with comparable skills, training and processes, against an equivalent NYNEX New York service representative population performing the same work. NYNEX New York believes that, excluding factors outside of NYNEX New York's control (e.g., LEC computer failures), as to most functions, the two populations can complete substantially the same amount of work in substantially the same time period.

41. NYNEX New York intends to test regularly, using an appropriate mix of transactions and workload, to insure comparability. These tests may use automatic load generators to simulate the traffic into the system, so as to produce a repeatable test, and so as to eliminate any variables arising from human order entry.

XIII. CONCLUSION

42. NYNEX New York provides access to OSS functions as described above. NYNEX New York is committed to working with LECs for the purpose of improving and enhancing NYNEX New York's resale and UNE capabilities.

43. This concludes my affidavit.

I hereby swear, under penalty of perjury, that the foregoing is true and correct, to the best of my knowledge and belief.

_____
Stuart Miller

Sworn to and subscribed before me this _____day of _____, 1997.

_____
Notary Public

My commission expires: _____

GLOSSARY

BMEX/REX	Business Marketing Expert/Residence Expert Systems. The BMEX/REX systems maintain an inventory, by end office, of the features and products available in a given switch. The features and products reflect NYNEX New York tariff offerings.
BRIAN	BRIAN is used to determine if a loop is conditioned for ISDN.
CABS	Carrier Access Billing System performs the access services billing functions within NYNEX New York. As such, they maintain access service CSRs, compute usage, compute recurring and non-recurring charges, generate bills, and process payments. Billing media can be a variety of formats from paper to electronic transmission.
CARMA	Claims Adjudication Record Management and Adjustment provides a mechanized process for managing customer claims by creating an on-line repository for recording the status of LEC reseller claims.
CRIS	Customer Record Information System maintains the end user Customer Service Records (CSRs) which contain services and products and performs billing functions. CRIS maintains CSRs, collects and computes usage, compute recurring and non-recurring charges, generate bills, and process payments.
DELPHI.	DELPHI provides analysis of the MLT test results to assist in trouble

isolation and recommends whether to dispatch technicians "in or out."

FACS	The Facility Assignment and Control System is a system used for provisioning; it contains LFACS and SOAC as subsystems.
OLP	On Line Provisioning system performs switch translation and other provisioning functions on an on-line basis.
LFACS	Loop Facility Assignment and Control System which inventories, maintains and assigns local loop facilities. This is a subsystem of FACS.
LMOS	Loop Maintenance Operations System which is in the process of being replaced by WFA, provides much of the same functionality as WFA.
MARCH	Memory Administration for Recent Change History which formats the switch translations and sends them to the switch, on a batch basis.
MLT	Mechanized Loop Testing System tests POTS type services and switch ports and provides the results of the test for screening.
PHOENIX	PHOENIX supports address validation, service order creation, loop qualification for ISDN.
PREMIS	PREMises Information System. PREMIS is used to validate that an address is a valid address served by NYT network facilities and is consistent with the data in NYT's provisioning and billing systems. PREMIS is also used to perform telephone number selection and reservation.

SMARTS	Service order Management, Administration, Report, and Tracking System provides due date availability for certain products and services. The system is utilized to determine order due dates in a given geographical region for a specific service offering. This is a subsystem of SOP.
SOAC	Service Order Analysis and Control acts as the "gatekeeper" of the Provisioning process. SOAC analyzes each service request for provisioning to determine what facilities are required, issues requests to other systems to assign facilities and issues requests for switch translation updates. SOAC maintains the status of each request in the worksteps and the assigned facilities for order completion. This is a subsystem of FACS
SOP	Service Order Processor is used to input the service order for Billing, Provisioning and record update. SOP also performs a series of "up front edits" that determine if an order's format is correct. SOP distributes the order to the required OSSs to work and complete. SOP updates the status of the service order based on updates from the provisioning and billing systems.
SWITCH/ COSMOS	SWITCH/COSMOS which inventories, maintains and assigns central office facilities.
TIRKS	Trunk Inventory Record Keeping System. TIRKS is used for channel facility assignment to determine channel availability on a switch port,

maintains and assigns trunks. It provides circuit order control, equipment order control, circuit design, inventory record maintenance, selection and assignment of components from inventory, network maintenance support, and the preparation and distribution of work orders.

WFA — Work and Force Administration System creates trouble tickets, may initiate a test, analyzes test results, dispatches technicians to the field or central office, maintains status on trouble tickets, history log and closes out trouble reports.